

CC Docket No. 94-102 – Status Report

Filed by: Keystone Wireless, L.L.C.
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Date: November 1, 2006

To: Marlene H. Dortch, Secretary
Federal Communications Commission
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Washington, D.C. 20554

By Electronic Submission:

Catherine W. Seidel, Acting Bureau Chief
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STATUS REPORT
Due November 1, 2006
CC Docket No. 94-102

Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Keystone Wireless, L.L.C. – FRN 0007 4157 06

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Information Regarding PSAPs:

Since the submission of its last Status Report, Keystone has received one new Phase II E-911 request from the PSAP for Snyder County. Thus, to date Keystone had received a total of seven Phase I requests and eight Phase II requests. As of Keystone's last Status Report, Keystone was working on the installation of its Phase I deployments in Center County and Lycoming County. Keystone has completed its Phase I deployment in Centre County and is working to complete the Phase I deployment in Lycoming County. Additionally, Keystone is continuing to work with the PSAPs in Clinton County, Montour County and Northumberland County to deploy Phase I E-911 in their respective counties. Keystone is also working with the PSAP in Snyder County to schedule implementation of Phase I E-911 before moving on to implementation of Phase II.

Keystone continues to keep all of the requesting PSAPs updated on the status of its implementation of Phase II E-911, and to provide each of them with copies of all related submissions to the Federal Communications Commission. Specifically, Keystone is maintaining its tri-weekly phone calls with Kimball & Associates, which represents the PSAPs for the counties of Center, Clinton, Lycoming, Montour and Northumberland. Keystone continues to maintain its contact, through Intrado, with the Schuylkill County PSAP. Keystone also is continuing to contact the Berks County PSAP director every couple of months to keep her apprised of its progress.

To date, none of these PSAPs has expressed any concerns or issues respecting Keystone's Phase II E-911 implementation efforts.

Implementation of Phase II Service:

Keystone previously reported that it has been exploring Phase II E-911 network-based solutions being developed by Polaris Wireless, Inc., and GBSD Technologies, Inc. ("GBSD"), among others. Keystone has put any substantive discussions with these companies on hold while it explores some new financing options, although it continues to monitor the market for new products or modifications to existing products that might potentially serve as Phase II solutions for Keystone's market. Keystone recently entered into a contract with Essential Management Solutions, LLC, ("EMS") a Pennsylvania 911 consulting firm. EMS is working with Keystone to initiate the Phase I cost recovery process with the State of Pennsylvania. EMS will also assist Keystone in acquiring funds from the State of Pennsylvania to deploy Phase II E-911. Once Keystone has secured such financing, Keystone will be in a better position to deploy Phase II E-911 and will resume more rigorous efforts to find and implement a viable Phase II E-911 network-based solution in its market.

Please note that even if there were *no* cost considerations whatsoever, and even if Keystone installed and deployed a network-based solution for its GSM system, doing so would *not* enable Keystone to meet the FCC's Phase II E-911 accuracy thresholds in all counties, unless and until there are new technological developments.

While continuing to pursue funding via EMS, Keystone is continuing to search out and explore network-based Phase II solutions such that upon receipt of funding Keystone will be well positioned to implement Phase II E-911. Please note, however, that even after such implementation, as noted above, Keystone would only achieve FCC-required accuracy levels in a portion of its service area.

Keystone plans to file with the Commission within the next 60 days a formal request for waiver of the Phase II requirements *nunc pro tunc* and through December 31, 2007.

Construction of New Cells and Expansion of Coverage:

Since its last Status Report, Keystone has upgraded four of its existing cell sites in its market, such that they each now have a larger coverage area. Keystone has not constructed any new cell sites in its market.

